UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

VERONICA MADDY, on behalf of herself and all others similarly situated,

Plaintiffs,

-against-

LaVida Massage Franchise Development, Inc.,

Defendant.

Docket No: 1:22-cy-5961

NOTICE OF SETTLEMENT IN PRINCIPLE AND REQUEST FOR A STAY OF PROCEEDINGS

Now comes the Plaintiff VERONICA MADDY, by and through her counsel, to provide notice to the Court that the parties have reached an agreement in principle, subject to their memorializing the terms thereof in a mutually acceptable written Settlement Agreement, to settle

this action, and states:

1. Once the Settlement Agreement is fully executed, Plaintiff, pursuant to the terms thereof, will file a Notice of Voluntary Dismissal with Prejudice, and without costs,

pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i).

2. The parties respectfully request that the Court stay all proceedings in this action for

a period of twenty-one (21) days and adjourn all related deadlines and conferences

to permit the parties to complete the written Settlement Agreement.

Dated: Queens, New York

November 10, 2022

Respectfully submitted,

/s/ Mars Khaimov

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